US LEC
voice / data / Internet

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VIA ELECTRONIC FILING

November 28, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: US LEC Acquisition Co. 911 Compliance Letter – WC Docket No. 05-196

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 9.5(f) and in conformance with the *Public Notice* entitled *Enforcement Bureau Outlines Requirement of November 28, 2005 Interconnected Voice Over Internet protocol 911 Compliance Letter (WC Docket No. 04-36 and WC Docket No. 05-196)* issued November 7, 2005 (DA 05-2945), US LEC Acquisition Co. submits its 911 Compliance Letter.

Should there be any questions or need for any additional information, please contact the undersigned either via phone (704.319.1119), facsimile (704.602.1119), or email (tromine@uslec.com).

Sincerely,

Terry J. Romine
Deputy General Counsel – Regulatory

cc: (via e-mail)
Kathy Berthot
Janice Myles
BCPI

Enclosures

November 28, 2005
Interconnected Voice Over Internet Protocol Compliance Letters
Submitted by US LEC Acquisition Co.
WC Docket No. 04-36
WC Docket No. 05-196

Pursuant to the *Public Notice* entitled *Enforcement Bureau Outlines Requirement of November 28, 2005 Interconnected Voice Over Internet protocol 911 Compliance Letter (WC Docket No. 04-36 and WC Docket No. 05-196)* issued November 7, 2005 (DA 05-2945), the following information is provided in connection with US LEC Acquisition Co.'s ("US LEC") VoIP 911 services:

911 Solution

- Description of 911 Solution. US LEC has contracted with Intrado to utilize the Intrado V9-1-1™ solution ("Service"), and, therefore, US LEC is able to deliver basic 911 to 100% of its subscribers and E911 services in all areas where (a) it is technically feasible to do so and (b) Intrado has coverage. Intrado enables a comprehensive approach to delivering E9-1-1 for US LEC by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address guide ("MSAG") Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Through the Service, US LEC also receives the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point ("PSAP"). Intrado manages the VPC functionality and the call deliver component on behalf of US LEC thereby enabling a full end-to-end solution from one service provider.

  The US LEC requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Intrado via a real-time interface and the connectivity to the Intrado network to enable live 9-1-1 call delivery.

- Percentage of Subscribers Provided 911 Services. US LEC is able to provide 100% of its subscribers basic 911 services and 67% of its subscribers 911 services in compliance with the rules established in the *VoIP 911 Order*.

- 911 Routing Information/Connectivity to Wireline E911 Network. Currently through the assistance of the Intrado Network providers, US LEC will have access to 154 E9-1-1 Selective Routers by November 28, 2005. Intrado has a major market deployment schedule to provide access to additional E9-1-1 Selective Routers; a number being schedule to be on-line by First Quarter 2006, then another set by Second Quarter 2006 and then ones that will be available for voice service only.

- Transmission of ANI and Registered Location Information.

    - Though Intrado, in the event of a 911 call, US LEC will transmit the 911 caller's 911 ANI and the Registered Location to the appropriate PSAP, if it is capable of receiving this information and Intrado has access to the PSAP. Because of the complexity and burden of attempting to determine each and every selective router in the country, US LEC contracted with Intrado to provide the connectivity necessary to transmit ANI and Registered Location information for the US LEC subscribers to comply with the FCC's rules. Consequently, US LEC does not have the necessary information to respond to the requests as to the percentage of PSAPs that are capable of receiving and processing ANI and Registered Location information in the US LEC service area. US LEC, however, provides the following information:

        - Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. Attached is a "Basic PSAP" map which reflects that areas within the US, which are not served by a Selective Router.

        - There are four (4) states and a territory within the US LEC serving area that operate off E9-1-1 Selective Routers, but Intrado will only provide ANI only service to the PSAP:

          New Jersey: Intrado has gained permission from the State to deploy a voice only service that includes the call taker receiving ANI on the VoIP 911 caller. That State ALI system is not capable of full dynamic ALI updates and will require an upgrade.

          Ohio: To date, Ohio has not granted permission to Intrado to deploy a voice only solution. The State ALI system is not capable of full dynamic ALI update.

          Hawaii: To date, Hawaii has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update.

          Puerto Rico: To date, Puerto Rico has not granted permission to Intrado to deploy a voice only solution. The ALI systems are not capable of full dynamic ALI update.

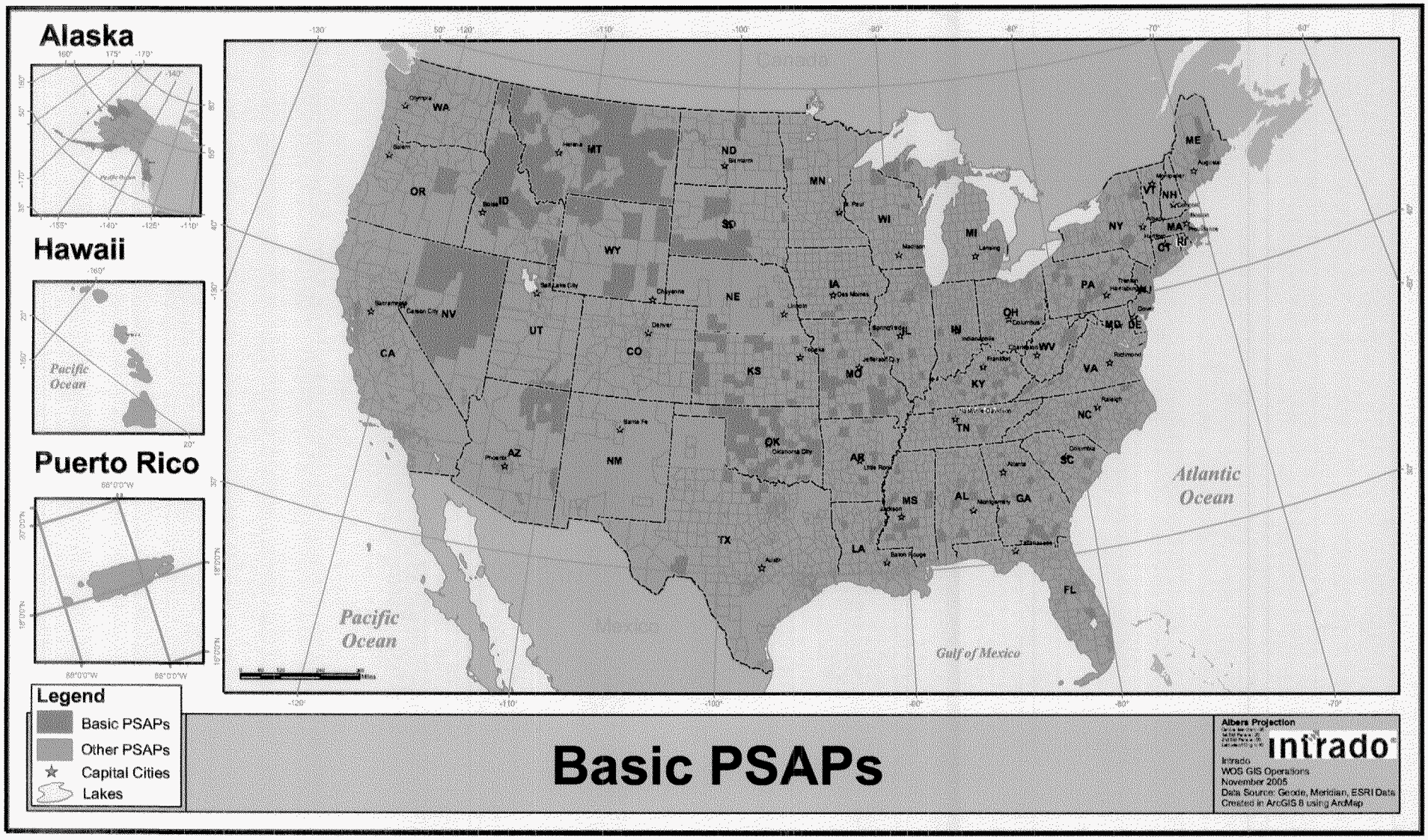
- 911 Coverage. The attached "Major Market Deployment Map," which corresponds with MSAs, identifies the regions within the US LEC service areas that have connectivity to at least one Selective Router, ALI steering capabilities, ANI and the ability to populate ALI. The areas are marked to reflect the planned

deployments by November 28, 2005, March 31, 2006 and June 30, 2006 and voice-only services.

- Obtaining Initial Registered Location Information. As each subscriber signs up for the VoIP service, the subscriber must provide the address of the physical location where the service will first be used. This is a required field and the subscriber may not obtain service until the field is completed. US LEC has obtained a Registered Location from 100% of its subscribers.

Obtaining Updated Registered Location Information. The subscriber is advised that if the equipment is moved to another location, an updated physical location must be registered before using the service. The subscriber may update the physical location by either logging into their account at the VoiceEclipse™ website and changing the existing Registered Location to the updated Registered Location or by calling the US LEC Network Operations Center ("NOC") using the CPE that the subscriber use to access the VoiceEclipse™ service.

Technical Solution for Nomadic Subscribers. US LEC by utilizing Intrado's V9-1-1™ Mobility Services is able to route VoIP emergency calls from the US LEC network to the Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate PSAP via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of the nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through the Validation and Update Interface (VUI) the V9-1-1 solution will enable the near real-time provision (Geocoding and MSAG Validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within 15 minutes of receipt.


Alaska
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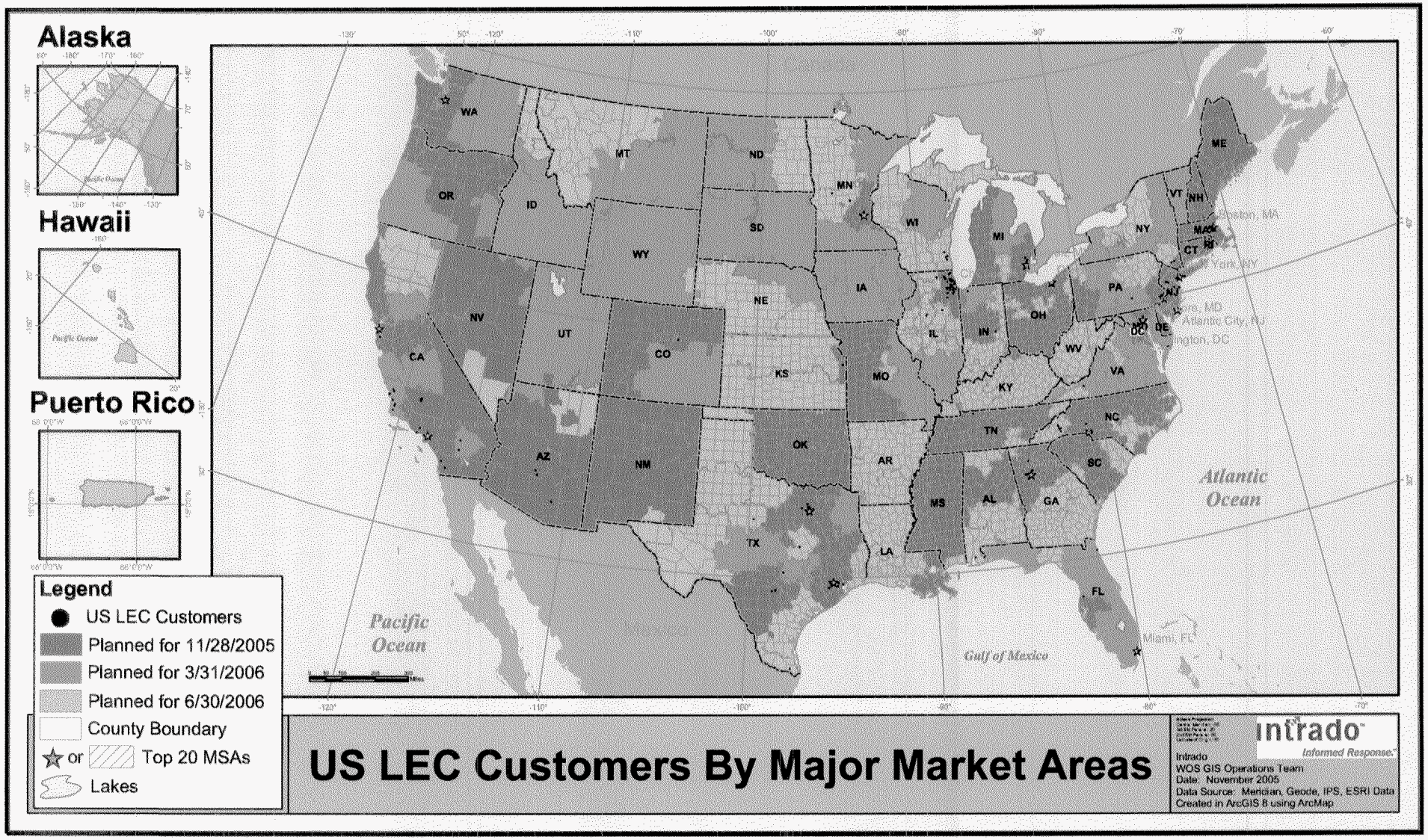
Legend
Basic PSAPs
Other PSAPs
Capital Cities
Lakes
Basic PSAPs
Albers Projection
Intrado
Intrado
WOS GIS Operations
November 2005
Data Source: Geode, Meridian, ESRI Data
Created in ArcGIS 8 using ArcMap



US LEC Customers By Major Market Areas

Intrado
Informed Response.

Intrado
WOS GIS Operations Team
Date: November 2005
Data Source: Meridian, Geode, IPS, ESRI Data
Created in ArcGIS 8 using ArcMap